

## REMARKS

This responds to the Office Action mailed on December 28, 2004.

Claims 1, 2, 8, 17, and 28 are amended; as a result, claims 1-30 are now pending in this application. No new matter was added by these amendments.

### Interview Summary

Applicant's Representative John Greaves would like to thank Examiner Jeremy Norris for the telephonic interview on February 7, 2005. Claims 1-30 were discussed in view of the Examiner's rejection(s) as identified in the Office Action of December 28, 2004, as well as the Examiner's objection to the drawings in same Office Action.

### Objection to the Drawings

The Examiner objected to the drawings because the sectional views are not properly crosshatched. Amended drawings are submitted herewith.

### Objection to the Abstract

The Examiner objected to the Abstract of the disclosure due to the sentence "A wire-bonding substrate is enclosed." The Abstract was amended.

### §102 Rejection of the Claims

Claims 1-9, 11, 12 and 14-28 were rejected under 35 USC § 102(e) as being anticipated by Huemoeller et al. (U.S. 6,784,376). Applicant respectfully traverses this rejection and requests the Office to consider the following.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." (*Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987), M.P.E.P. §2131, 8<sup>th</sup> Ed., Rev. 1).

Independent claims 1, 8, 17, 24, and 28 have been amended to include the limitation illustrated in the figures, that the first via is disposed symmetrically and directly below the first

**IN THE DRAWINGS**

Corrected drawings are supplied herewith, each labeled as "REPLACEMENT SHEET".

Each figure depicted in cross-section has been properly cross-hatched.

wire-bond pad. This amendment was discussed during the interview. Huemoeller does not teach or suggest these claims as amended. Withdrawal of the rejections is respectfully requested.

Regarding claim 2, Huemoeller does not teach or suggest staggered vias. Withdrawal of the rejection is respectfully requested.

Claims 8, 10 and 28-30 were also rejected under 35 USC § 102(e) as being anticipated by Wenzel et al. (U.S. 6,812,580). Applicant respectfully traverses this rejection and requests the Office to consider the following.

Independent claims 1, 8, 17, 24, and 28 have been amended to include the limitation illustrated in the figures, that the first via is disposed symmetrically and directly below the first wire-bond pad. This amendment was discussed during the interview. Wenzel does not teach or suggest these claims as amended. Withdrawal of the rejections is respectfully requested.

Regarding claim 2, Wenzel does not teach or suggest staggered vias. Withdrawal of the rejection is respectfully requested.

#### §103 Rejection of the Claims

Claim 13 was rejected under 35 USC § 103(a) as being unpatentable over Huemoeller et al. in view of Egitto et al. (U.S. 2003/0147227). Applicant respectfully traverses the rejection and requests the Office to consider the following.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (M.P.E.P. § 2143 8<sup>th</sup> Ed, Rev.1).

Huemoeller in connection with Egitto does not teach or suggest the limitation of the independent claims, that the first via is disposed symmetrically and directly below the first wire-

bond pad. Further, Egitto teaches a flip-chip technology, which is not contemplative of wire-bonding as claimed in the instant application. Applicant respectfully asserts that the motivation to combine the references can come only by using Applicant's disclosure as a guide. Further, Applicant respectfully asserts that all the claimed limitations are not taught in the combined references. Withdrawal of the rejection is respectfully requested.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney John Greaves at 801-278-9171, or the below-signed attorney at (612) 349-9592, to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

BRIAN TAGGART ET AL.

By their Representatives,

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Date April 28, 2005

By Ann M. McCrackin  
Ann M. McCrackin  
Reg. No. 42,858

CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: MS Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 28th day of April 2005

Dennis J. Vengroff

Name

Signature

